

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In Re TERRORIST ATTACKS on	)	03 MDL 1570 (RCC)
SEPTEMBER 11, 2001	)	ECF Case
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*This document relates to:*

*Estate of John P. O'Neill, Sr. et al. v. Republic of Iraq, et al., 04-CV-1076 (RCC)*

*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-CV-1923 (RCC)*

**Declaration of Gina MacNeill, Esquire**

GINA M. MAC NEILL, on this 24th day of January, 2006, hereby declares pursuant to 28 United States Code Section 1746, and under penalties of perjury, that the foregoing is true and correct:

1. I am an attorney at law, licensed to practice law in the Commonwealth of Pennsylvania, the State of New Jersey, and admitted to practice in the United States District Court for the Southern District of New York.

2. I, along with Jerry S. Goldman, Esquire and others, am an attorney of record in the instant matter.

3. Attached hereto and incorporated herein as Exhibit A, is a true and accurate copy of the so ordered Scheduling Stipulation entered on May 9, 2005, docket 876 ("First Order").

4. Attached hereto and incorporated herein as Exhibit B, is a true and accurate copy of the so ordered Scheduling Stipulation of July, 2005, docket 1026 ("Second Order").

5. Attached hereto and incorporated herein as Exhibit C, is a true and accurate copy of the Court approved scheduling stipulation of July 8, 2005, docket 1045 (“Third Order”).

6. Attached hereto and incorporated herein as Exhibit D, is a true and accurate copy of the Court approved scheduling stipulation of August 25, 2005, docket 1222 (“Fourth Order”).

7. Attached hereto and incorporated herein as Exhibit E, is a true and accurate copy of the Court endorsed extension of time for the Defendants to file their Reply of September 8, 2005, docket 1223 (“Fifth Order”).

8. Attached hereto and incorporated herein as Exhibit F, is a true and accurate copy of the letter of Defendants’ counsel to the Court of August 25, 2005.

9. Attached hereto and incorporated herein as Exhibit G, is a true and accurate copy of the letter of Plaintiffs’ counsel to Defendants’ counsel of August 26, 2005.

10. Attached hereto and incorporated herein as Exhibit H, is a true and accurate copy of the Plaintiffs’ RICO Statement of June 15, 2005 (Docket 998).

11. Attached hereto and incorporated herein as Exhibit I, is a true and accurate copy of Plaintiffs’ Amended RICO Statement of August 2, 2005 (Docket 1105).

12. Attached hereto and incorporated herein as Exhibit J, is a true and accurate copy of the Plaintiffs More Definite Statement/Additional Allegations Pursuant to CMO 2, ¶ 13, pertaining to *Estate of John P. O’Neill, Sr. et al. v. Republic of Iraq, et al.*, 04-CV-1076 (RCC), filed on September 30, 2005 (Docket1361).

13. Attached hereto and incorporated herein as Exhibit K, is a true and accurate copy of the Plaintiffs More Definite Statement/Additional Allegations Pursuant to CMO 2, ¶ 13,

pertaining to *Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-CV-1923 (RCC), filed on September 30, 2005 (Docket 1339).

14. Attached hereto and incorporated herein as Exhibit L, is a true and accurate copy of the transmittal letter of Defendants' counsel dated September 14, 2005, wherein they withdrew their letter of August 25, 2005 and filed their Reply.

15. Attached hereto and incorporated herein as Exhibit M, is a true and accurate copy of the Letter to Court of Andrea Bierstein, June 10, 2004 ("Bierstein Letter").

16. Attached hereto and incorporated herein as Exhibit N, is a true and accurate copy of the Court's Letter Endorsement, Docket N, of June 14, 2004 in response to the Bierstein Letter.

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